



BILL OWENS  
Governor

## DEPARTMENT OF LABOR AND EMPLOYMENT

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Category: Legal
Subject: Universal Access
Source: State/Federal
Revise/Replace: None
Contact: Equal Opportunity Administrator
Distribution: All SDA/OSC, Financial, Program and Administrative Staff, One-Stop Career Center Administrators/Operators, Workforce Investment Boards
Colorado One-Stop System Policy Guidance Letter 02-05-L
Date: January 24, 2002

### **I. REFERENCE(S):**

29 CFR Part 37, Implementation of the Nondiscrimination and Equal Opportunity Provisions of the Workforce Investment Act of 1998, specifically 29 CFR 37.54 (d)(2)(vii).

### **II. PURPOSE:**

This Policy Guidance Letter (PGL):

Provides guidance on the United States Department of Labor requirements regarding universal access to programs and activities financially assisted under Title I of the Workforce Investment Act of 1988

### **III. BACKGROUND:**

The requirements for universal access are addressed in the Implementation of the Nondiscrimination and Equal Opportunity Provisions of the Workforce Investment Act (WIA) of 1998, 29 CFR Part 37. These requirements are treated separately from the requirements regarding reasonable accommodation for individuals with disabilities. A separate Policy Guidance Letter will address reasonable accommodation.

The programs and activities established by and financed through the WIA are designed to serve

the broadest possible representation of potential customers within a Local Workforce Investment Area (LWIA). The section in the Equal Opportunity (EO) regulations pertaining to universal access may be found at 29 CFR Part 37.42. The EO regulations state, “Recipients must take appropriate steps to ensure that they are providing universal access to their WIA Title I financially assisted programs and activities. These steps should involve reasonable efforts to include members of both sexes, various racial and ethnic groups, individuals with disabilities, and individuals in differing age groups.”

#### **IV. POLICY/ACTION:**

1. When advertising programs and activities in the various media (including the internet), ensure that the above-mentioned groups are targeted and included in those publications, stations, and websites.
2. Advertisements or program offerings should be shared with schools and community service agencies that serve the above groups.
3. A list of various media, schools, and community service agencies should be developed and maintained at the LWIA level for advertisement and recruitment purposes.
4. Efforts should be made to consult with community service agencies and One-Stop partners about ways to improve outreach and service for the populations mentioned above. A record of these efforts should be maintained for monitoring purposes.
5. As developed, samples of advertisements, public service announcements, posters and recruitment material that take into account the requirement for universal access should be maintained for monitoring purposes.
6. The special needs of various groups such as individuals with disabilities and individuals who communicate in languages other than English should be considered when advertising, recruiting, and preparing brochures or other types of publications and electronic communications.
7. The LWIA’s, Colorado Department of Labor and Employment and One-Stop centers should obtain Census or other reliable information to determine the characteristics of individuals in the area who could potentially use WIA Title I financially assisted services.

#### **V. IMPLEMENTATION DATE:**

The requirements set forth in this directive are effective immediately. Documentation of all advertisement and outreach efforts must be maintained and be available for review by local, state, or federal EO Officials.

#### **VI. INQUIRIES:**

Inquiries concerning this PGL should be directed to JoAnna Miller, EO Administrator at 303-318-8206 or E-mail: [joanna.miller@state.co.us](mailto:joanna.miller@state.co.us).